

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division



UNITED STATES OF AMERICA

v.

DAWDA DRAMMEH,

Defendant.

) Case Number:  
) UNDER SEAL

3:13MJ028

**GOVERNMENT'S MOTION TO SEAL CRIMINAL COMPLAINT AND ARREST  
WARRANT AND SUPPORTING MEMORANDUM**

The United States of America by its representative, Michael C. Moore, Assistant United States Attorney, requests that the Criminal Complaint in the above-captioned case as well as warrant of arrest for the defendant be placed under seal. In support of the motion, the government represents the following:

1. Disclosure of the Criminal Complaint or the related arrest warrant in this matter could result in the defendant's flight to avoid prosecution, witness tampering, witness intimidation, or destruction of evidence. Moreover, if the defendant is given notice of the complaint, arresting law enforcement agents might be endangered.


2. The reasons for sealing the Criminal Complaint and arrest warrants outweigh the interest of the public in knowing the contents of this filing prior to the initial appearance of the defendant. *See In Re Sealed Affidavits*, 600 F.2d 1256 (9<sup>th</sup> Cir. 1979). Restricting public access to court documents such as this should be ordered upon a showing of a compelling governmental interest and a measure narrowly tailored to serve that interest. *See Baltimore Sun Co. v. Goetz*,

886 F.2d 60, 62-63 (4<sup>th</sup> Cir. 1989). Here, sealing the above-described documents until after the defendant's initial appearance is a measure that is narrowly tailored to address the compelling governmental interests discussed above.

Respectfully submitted,

NEIL H. MACBRIDE  
UNITED STATES ATTORNEY

By:

A handwritten signature in black ink, appearing to read "Michael C. Moore", written over a horizontal line.

Michael C. Moore  
Assistant United States Attorney